

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**TYRONE HENDERSON,  
on behalf of himself and others  
similarly situated,**

**Plaintiff,**

**v.**

**INSTANT CHECKMATE LLC,**

**Defendant.**

**Case No. 3:12-cv-00109-REP**

**DEFENDANT INSTANT CHECKMATE LLC'S  
MOTION TO DISMISS PLAINTIFF TYRONE HENDERSON'S COMPLAINT**

Defendant INSTANT CHECKMATE LLC, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and Local Rule 7(f), moves this Court to dismiss the Complaint filed herein by Plaintiff TYRONE HENDERSON for the reasons stated in the accompanying Memorandum of Points and Authorities, which are incorporated by reference as though set forth fully herein.

Dated: April 13, 2012.

Respectfully submitted,

INSTANT CHECKMATE, LLC

By Counsel

/s/ Hanna Lee Blake

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 13th day of April, 2012, I served a true and correct copy of the foregoing along with a Memorandum of Points and Authorities and a Proposed Order, via the Court's electronic filing ("CM/ECF") system and First Class U.S. Mail to:

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